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Attorneys for Defendant
TREVOR GRAHAM

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

TREVOR GRAHAM,

Defendant.

Case No. CR 06-0725 SI (JCS)

**STIPULATION AND [PROPOSED]
ORDER CONTINUING HEARING ON
DEFENDANT'S MOTION FOR
PRODUCTION OF JENKS ACT AND
BRADY/GIGLIO MATERIALS**

Judge: The Honorable Susan Illston
Hearing: March 28, 2008
Time: 11:00 a.m.

WHEREAS, Defendant Trevor Graham ("Graham") has moved for an order directing the United States to produce all Brady/Giglio and Jenks Act materials in the United States Anti-Doping Agency's ("USADA") possession;

WHEREAS, Graham has served USADA with a Rule 17(c) subpoena and USADA produced documents responsive to that subpoena on Friday, March 21;

WHEREAS, Graham and USADA have met and conferred regarding USADA's response, identified a limited number of disputed documents, and agreed that Graham will file a motion to compel their production on April 11th and set the hearing on that motion for April 25th at 11:00 a.m.;

1 WHEREAS, these discussions are continuing and could potentially resolve Graham's
2 Motion for Production of Brady/Giglio and Jenks Materials, as well as his planned motion to
3 compel production of documents from USADA, without a court ruling;

4 WHEREAS, Graham requests, for efficiency purposes, to move the hearing on Graham's
5 Motion for Production of Brady/Giglio and Jenks Materials to April 25th at 11:00 a.m, the same
6 date as the hearing on Graham's anticipated motion to compel. The United States does not object
7 to this request. The parties do not anticipate that they will reschedule the hearing again, and do
8 not expect these scheduling changes to affect the trial date.

9 Defendant Trevor Graham, by and through his undersigned counsel, and the United States,
10 by and through its undersigned counsel, hereby STIPULATE as follows:

11 1. The hearing on Defendant's Motion for Production of Jenks Act and Brady/Giglio
12 Materials, currently scheduled for March 28, 2008 at 11:00 a.m., will now be heard on April 25,
13 2008 at 11:00 a.m.

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2. Defendant's reply brief, if any, on the Motion for Production of Jencks Act and
Brady/Giglio Materials will be filed and served on Friday, April 18, 2008.

SO STIPULATED.

Dated: March 26, 2008

FARELLA BRAUN + MARTEL llp

By: /s/ William P. Keane
WILLIAM P. KEANE
Attorneys for Defendant
TREVOR GRAHAM

Dated: March 26, 2008

By: /s/ Jeffrey Finigan
JEFFREY FINIGAN
Attorneys for Plaintiff
UNITED STATES OF AMERICA

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: _____, 2008



Hon. Susan Illston
Judge of the United States District Court